

FILED

AO 91 (Rev. 11/11) Criminal Complaint

MAR 24 2020

## UNITED STATES DISTRICT COURT

for the

Western District of TexasCLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY *[Signature]*  
DEPUTY CLERK

United States of America

)

v.

)

TARAS KERR

)

)

)

)

Case No. *5:20-MJ-455*Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 6, 2020 in the county of Bexar in the  
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18/876(c)	(1) Mailing Threatening Communications to an employee of the U.S.
18/871	(2) Threats Against the President. (3) Explosive Materials - Maliciously Conveying False Information.
18/844(e)	PENALTIES: (1&3) - 10 yrs imprisonment, \$250,000 fine, or both, 3 yrs SR, & \$100 SA. (2) 5 yrs imprisonment, \$250,000 fine, or both, 3 yrs SR, & \$100 SA.



This criminal complaint is based on these facts:

Advisory to the Court: While in state custody, this defendant continues to threaten Government Officials, including the POTUS and the Attorney General, as well as local law enforcement. Because his threats reference the involvement of other individuals, the prompt transfer of the defendant into federal custody is essential for the safety of the victims and the community.

 Continued on the attached sheet.*DEZ*

Complainant's signature

Daniel E. Morales, ASAC, SS

Printed name and title

- Sworn to before me and signed in my presence.  
 Sworn to telephonically and signed electronically.

Date:

*3/27/2020*City and state: San Antonio, Texas*H J Bemporad*

Judge's signature

Henry J. Bemporad, US Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Daniel Morales, being duly sworn, hereby depose and say

I am an Assistant Special Agent in Charge, assigned to the San Antonio Field Office, United States Secret Service, since December 2018 and a Special Agent of the United States Secret Service since March 1996.

The information contained in this affidavit is based on my training, experience, and participation in threat cases, my personal knowledge and observations during the course of this investigation, and information provided to me by other sources noted herein.

**Correspondence Dated February 6, 2020**

On or about February 6, 2020, Taras KERR, deposited a handwritten letter into a mail receptacle designated for delivery of mail by the U.S. Postal Service located within Bexar County Detention Center, 200 North Comal Street, San Antonio, Texas. The envelope was addressed to Clerk, United States Courthouse, 655 E. Cesar E. Chavez Blvd., Suite G-65, San Antonio, Texas 78206, and the correspondence within addressed the United States Judges, an employee of the United States pursuant to Title 18, United States Code, section 1114. The letter, received at the Federal Courthouse, on February 7, 2020, contained threats to kill numerous public officials, including the President of the United States, the Attorney General of the United States and the United States Judges, as well as local law enforcement officers and members of KERR's family. KERR's letter also contained threats to bomb several local businesses and law enforcement offices -- state and federal. A portion of the letter contains the following threats.

"To all of the United States Judges who have dismissed any of my cases.... you will all be made examples of just like Judge John H. Woods Jr<sup>1</sup>."

KERR further states, "Please inform the Secret Service that I will no longer speak to them that this is above their pay grade. Inform the Secret Service that we<sup>2</sup> will bomb the F.B.I. field office in San Antonio as well as the San Antonio Police Department ..."

"[T]hese people<sup>3</sup> will be killed...."

**Correspondence Dated February 9, 2020**

On or about February 9, 2020, Taras KERR, deposited a handwritten letter into a mail receptacle designated for delivery of mail by the U.S. Postal Service located within

---

<sup>1</sup> The Honorable John H. Woods, Jr. was murdered on May 29, 1979.

<sup>2</sup> NOTE: KERR's threats frequently incorporate the plural pronoun "we," requiring federal agents to employ extensive investigation for the safety of the victims, as well as the community. The names of the other parties are withheld at this time, as the investigation is ongoing.

<sup>3</sup> In his letter, Taras KERR listed seventeen (17) individuals and identified four (4) locations.

Bexar County Detention Center, 200 North Comal Street, San Antonio, Texas. The envelope was addressed to Clerk, United States Courthouse, 655 E. Cesar E. Chavez Blvd., Suite G-65, San Antonio, Texas 78206, and the correspondence within was addressed to the Honorable United States Judge Jason Pulliam, an employee of the United States pursuant to Title 18, United States Code, section 1114. The letter, received on February 12, 2020, contained threats to kill several public officials and bomb several buildings in the San Antonio area, a portion of the letter which contains the threatening language is as follows:

“Dear United States Judge Jason Pulliam, First of all dumbass I am going to kill Police Officer Garry Fry for trying to murder me.” ..... “I WILL PUT A BOMB IN YOUR FEDERAL BUILDING, THIS JAIL, SAPD AND CHIEF WILLIAM McMANUS IS DEAD AND CHIEF JAVIER SALAZAR IS DEAD...”

#### **Interview of Victims**

Your Affiant has interviewed a number of the individuals threatened by KERR; they are alarmed and have experienced substantial emotional distress as a result of KERR’s threats.

#### **Interview of Taras KERR**

On February 11<sup>th</sup> and 18<sup>th</sup>, 2020, federal agents interviewed TARAS KERR at the Bexar County Detention Center. Following his statutory and constitutional warnings, KERR admitted to writing and mailing the above referenced letters (in addition to others not articulated herein) to the Federal Courthouse in San Antonio, Texas. KERR explained he is angry and frustrated with the judicial system, and mailed the letters containing threats to make people pay attention to him and listen to his complaints. KERR acknowledged the wrongfulness of his actions and told agents he would not mail any more threatening letters. Nonetheless, KERR continued to mail communications containing threats.

#### **Conclusion**

Based on the above information, your Affiant believes that on or about February 6, 2020, and February 9, 2020, TARAS KERR, did, in the Western District of Texas,

- (a) knowingly and willfully deposited for conveyance in the mail or for delivery from any post office or by any letter carrier any letter, paper, writing, print, missive, or document containing any threat to take the life of, or to inflict bodily harm upon, the President of the United States;
- (b) knowingly deposited or caused to be delivered a communication addressed to any other person, a person being a public official, and containing any threat to injure the person of the addressee or of another; and
- (c) through the use of the mail, willfully made a threat, or maliciously conveyed false information knowing the same to be false, concerning an attempt or alleged attempt being made, or to be made, to kill, injure, or intimidate any individual or unlawfully to damage personal property by means of fire or an explosive.

All in violation of Title 18, United States Code, Sections 871(a), 876(c) and 844(e), that being Threats against the President, Mailing Threatening Communications to a Public Official, and Explosive Materials – Willfully Making a Threat, respectively.

  
\_\_\_\_\_  
Daniel E. Morales  
U.S. Secret Service

Subscribed to on this 24<sup>th</sup> day on March 2020.

  
\_\_\_\_\_  
HENRY J. BEMPORAD  
United States Magistrate Judge